

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
HERMAN CALVIN BRIGHTMAN, :
a/k/a "Nazir Griffiths," :
a/k/a "Nazir Luckett," :
:
Defendant. :
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PROTECTIVE ORDER
23 Cr. 642 (JPC)

Upon the application of the United States of America, DANIELLE SASSOON, United States Attorney for the Southern District of New York, by and through Lisa Daniels, Patrick Moroney, and Ni Qian, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of certain sensitive material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972), and the Government's general disclosure obligations or practices, relating to witnesses the Government anticipates may be called to testify at the *Fatico* hearing ("3500 Material"), made on consent, and based on the Court's independent review, it is hereby

ORDERED that (1) any 3500 Material reflecting sensitive non-public information regarding civilian witnesses produced by the Government in this action is deemed "Sensitive 3500 Material" and shall be so identified by the Government; (2) the defense is precluded from disseminating any of the Sensitive 3500 Material (and any copies thereof) to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense; and (3) the defendant is precluded from taking any Sensitive 3500 Material (or any copies thereof) with him either before, during, or after the *Fatico* hearing; except that the defendant may possess and review

the Sensitive 3500 Material (or any copies thereof) only while in the presence of defense counsel and/or any paralegal or staff employed by the defense, and may not otherwise possess any Sensitive 3500 Material (or any copies thereof).

Dated: New York, New York
 January 27, 2025



THE HONORABLE JOHN P. CRONAN
UNITED STATES DISTRICT JUDGE

The parties shall comply with Individual Rule 9, which governs redactions and sealed filings. The Clerk of Court is respectfully directed to close Docket Number 46.